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**Privacy Impact Assessment
for the**

System To Automate Recovery (STAR)

March 13, 2009

Contact Point

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US Department of Education

Privacy Impact Assessment
GC Services Houston Corporate Office
[System To Automate Recovery (STAR)]

1. What information will be collected for the system?

Any and all information needed in the course of collecting on the defaulted debt, including documented conversations with date, time, results, updated demographic, financial and contact information.

2. Why is this information being collected?

In an attempt to collect on the defaulted debt based on information passed to us by the Department of Education.

3. How will FSA use this information?

Update location information and provide guidance if necessary on how GC Services should proceed. We will be sharing information with our approved skip/administrative resolution vendors for the purpose of locating/resolving the collection of the specified debt. We do not share information with other Private Collection Agencies (PCA's).

4. Will this information be shared with any other agency or entity? If so, with which agency or agencies/entities?

We share minimal debtor information (Name and SSN) with our approved skip/administrative resolution vendors for the purpose of locating/resolving the collection of the specified debt. Approved agency/entities used by GC Services are: Lexis Nexis, American Info Source, Central Research, Experian, Trans Union, Teletrack, TALX, Insight, CBC INNOVIS, PACER and Vital Check

5. Describe the notice or opportunities for consent that would be or are provided to individuals about what information is collected and how that information is shared with other organizations.

Each letter has the required state and federal disclaimers as well as each contact identify the debt and use the mini-miranda. We only share demographic information with our Department of Education approved skip or administrative vendors.

The GC Services, LLP receives information from the Department of Education, Federal Student Aid Debt Management and Collection System (DMCS). As DCMS is the parent system from where GC Services, LLP receive privacy information, the DCMS warning and privacy disclosure statement below is used:



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DISCLOSURE STATEMENT: "The user understands that the Department of Education, its agents and sub-contractors have signed up to meet the requirements of the "PRIVACY ACT of 1974" (as amended). As such, by entering this system, the user hereby verifies that he/she has read the "PRIVACY ACT of 1974" (as amended), that the user understands the requirements of the act, and that the user has no remaining unanswered questions."

The GC Services, LLP will not further disclose the information except as defined by the System of Records Notice in the interest of the U.S. Government and the Department of Education. GC Services, LLP company privacy policy also restricts the sharing of information.

6. How will the information be secured?

Information is secured in centralized databases on servers within the GC Services Computing Center at its Houston Texas corporate headquarters. Facility security controls include fenced perimeter with controlled access and exit gating, digital camera monitoring and recording system, proximity access card system, visitor identification and escort process and onsite security guard service 24 x 7 x 365. Logical controls include dual and diverse network infrastructure protected by multiple firewalled access, data access control restrictions at router, server, directory and file level, data encryption at rest and in transmission, 24 x 7 x 365 operational systems monitoring with audible and visual alerts within a computer operations center. Information is generally retained on systems that are updated as the collector is on the phone with the debtor. Any hard copy data printed by managers for use in the collections process is placed in locked Shred bins and is then picked up and destroyed by our approved shredding vendor with a GC Services employee visually witnessing the destruction.

7. Is a system of records being created or updated with the collection of this information?

A "System of Records" was created for the Common Services for Borrowers (CSB) Contract. GS Services, LLP is working under this "System of Records."

The "System of Records" was published in the Federal Register (Volume 71, Number 14/Monday, January 23, 2006/Notices).